

**THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

**ROTHSCHILD BROADCAST
DISTRIBUTION SYSTEMS, LLC,**

Plaintiff,

v.

DIALPAD, INC.,

Defendant.

CIVIL ACTION NO. 6:20-cv-1040-ADA

MOTION FOR CLERK'S ENTRY OF DEFAULT

Pursuant to Fed. R. Civ. P. 55(a), Plaintiff Rothschild Broadcast Distribution Systems, LLC (“Plaintiff” and/or “RBDS”) hereby submits this Motion for Clerk’s Entry of Default Judgment. Plaintiff requests that the Clerk enter the default of Defendant Dialpad, Inc., as the party against whom a judgment is sought has failed to plead or otherwise defend, and that failure is shown by the Affidavit of Jay Johnson, attached hereto as Exhibit A.

Wherefore, Plaintiff respectfully prays that this Motion be Granted and that the Clerk’s entry for default be entered against Defendant Dialpad, Inc.

Dated: May 5, 2021

Respectfully submitted,

/s/Jay Johnson
JAY JOHNSON
State Bar No. 24067322
KIZZIA JOHNSON PLLC
1910 Pacific Avenue, Suite 13000
Dallas, Texas 75201
(214) 451 -0164
Fax: (214) 451-0165
jay@kjpllc.com

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true copy of the foregoing was filed electronically and served by operation of the Court's electronic filing system on May 5, 2021. Parties may access the foregoing through the Court's system.

/s/Jay Johnson
JAY JOHNSON